

Plant Emissions Permit Meeting
November 18, 1982

CHARLOTTE J. WELTY

NOV 22 1982

Project Office

J. Anthony
R. Nelson
B. Campbell
M. Weiss

APERA

S. Clark
T. Conkin

This meeting was held to discuss alternatives relating to the Utah Department of Health letter dated September 3, 1982 regarding Intermountain Power Project (IPP) plant emissions. The Utah Department of Health is concerned that a four unit plant operating at boiler MCR would exceed air quality levels delineated in the IPP permit.

Preliminary discussions were held between Steve Clark and Dave Kopta and Monte Keller of the Utah Division of Environmental Health. A copy of Steve's memorandum summarizing these discussions is attached.

The following alternative replies to Utah were discussed in this meeting (comments in parentheses):

1. Do not respond to Utah's letter (rejected; this would endanger the permits).
2. The Project would live with the existing permit condition of 7.493×10^6 BTU/hr (this would yield no increase in emissions and require no modeling; however this would commit the Project to existing permit limits. This condition is with the valves wide open, but not over pressure. This alternative would still require a public hearing on the baghouse).
3. Request to run the plant at the Turbine-Generator MCR (this would increase emissions above the permit conditions and would, therefore, require modeling and re-open the permit process to public comment).
4. Request to run the plant at the Boiler MCR, which is the Turbine-Generator MCR + 151,000 lb/hr (this results in the highest emissions of all alternatives and would also require modeling and re-open the permit process).
5. Ratchet down emissions.

The following decisions were reached at this meeting:

1. A commitment will be made for boilers operating at 8.352×10^6 BTU/hr with a boiler steam flow of 6,600,000 lb/hr. This will probably require the Project to commit to a two unit plant and also means that should a decision be made in the future to construct Units 3 and 4, additional permits would be required.

2. Utah will be supplied with a copy of Black & Veatch's fugitive emissions study.
3. APERA will talk to Ken Nishwander (Deseret) to discuss Deseret's experiences with the Utah permit process. In addition, APERA will contact UP&L to discuss their experience.
4. Mr. Anthony will discuss the permit process with UP&L and Intermountain Power Agency (IPA) representatives at the IPP Coordinating Committee meeting on Monday, November 22, 1982.
5. APERA will contact attorneys for Hunton and Williams for advice and support. Hunton and Williams may handle this themselves or, possibly, contact an attorney in Utah with permit experience. RLN will draft a contract with Hunton and Williams ASAP. In addition, APERA will discuss this matter with Ron Rencher, the IPA attorney.
6. APERA will contact H. E. Cramer Company to insure that money is available in their contract for additional modeling work.
7. APERA will not formally respond to Utah until all of the above measures have been discussed with legal counsel. The Project Office must be consulted before Utah is notified of the Department's decision. The Department's response to Utah's letter will be delayed beyond November 29, 1982 due to the need for legal assistance.
8. The extent of the Environmental Defense Fund inquiry and concerns, along with those of a group of concerned citizens, will be investigated.

MGW:mep
Attachment

cc: w/Attachment
M. J. Nosanov
S. A. Clark
L. A. Kerrigan
T. L. Conkin
J. H. Anthony
L. E. Johnson
B. Campbell
J. M. Hayashi
R. L. Nelson
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